

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff / Counterclaim Defendant,

v.

ALAN DERSHOWITZ,

Defendant / Counterclaim Plaintiff

Case No. 19-cv-03377-LAP

AFFIDAVIT OF ANTHONY LYONS

I, Anthony Lyons, having been duly sworn, do hereby state as follows:

1. I am over eighteen years of age and believe in the obligation of an oath.
2. I am the President and Publisher of Skyhorse Publishing, with offices at 307 West 36th Street, New York, NY 10018.
3. Skyhorse has published several titles written by Alan Dershowitz, including “Guilt by Accusation: The Challenge of Proving Innocence in the Age of #MeToo.” I consider Alan a friend.
4. On October 2, 2019, I met with Sharon Churcher at Skyhorse’s New York offices to discuss the possibility of Skyhorse publishing a book Churcher was working on regarding the “Me Too” movement. The project was still in its conceptual stages, and we discussed the idea of marketing the book as a type of handbook for how to behave in the “Me Too” era.
5. During our meeting, which I recorded, Churcher raised the topic of Alan and his recent book “Guilt by Accusation” which Skyhorse had published. Churcher told me that she had personal knowledge of the subject matter of Alan’s book because she had conducted a series

of interviews of Virginia Roberts Giuffre in the Spring of 2011 which she published in a series of articles shortly thereafter.

6. Churcher told me the following regarding Virginia Roberts Giuffre and her accusations against Alan:

- a. Based upon her interactions with Giuffre, she does not believe that Giuffre's claims against Alan are true;
- b. Giuffre was under contract and was being paid a lot of money to be truthful in her interviews with Churcher;
- c. During their interviews, Giuffre never identified Alan as someone she had sex with, despite Giuffre naming numerous other prominent men to Churcher;
- d. Churcher presented Giuffre with a list of names and photos of prominent male friends of Jeffrey Epstein, including Alan, and asked her to identify which of the men she had sex with. In response, Giuffre still did not identify Alan as someone she had sex with;
- e. There were some men, like Ehud Barak, whom Giuffre named but whom Churcher did not include in her articles because they had threatened litigation, but Alan was not one of them;
- f. Churcher doesn't use the word "pedo," and consequently, she suspects that the email exchange produced by Giuffre in which she suggests Alan's name would be a good name for Giuffre's book may have been altered;
- g. Giuffre's former lawyer, Brad Edwards, hates Alan stemming from a lawsuit Epstein filed against Edwards, and Churcher believed that Edwards and his team put Giuffre up to accusing Alan;

- h. Churcher believes Giuffre may have originally confused Alan with another Harvard professor; and
- i. Giuffre has changed her story about Donald Trump. She told Churcher, and Churcher published, that she would lie around half naked at Mar a Lago, and Trump would say to Epstein, “you have the life.” Churcher always remembered this quote because it was a very distinct quote. Now Giuffre denies she said that.

I declare under penalty of perjury that the foregoing is true and correct.



Anthony Lyons

Dated: October 20, 2020